

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re Application of

Case No. 20-CV-_____

ABRAAJ INVESTMENT MANAGEMENT
LIMITED,

For An Order To Obtain Discovery For Use
In Foreign Proceedings Pursuant To
28 U.S.C. §1782.

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[PROPOSED] ORDER

Upon consideration of the *Ex Parte* Application of ABRAAJ Investment Management Limited (in Official Liquidation)(“AIML”), by and through its Joint Official Liquidators (“JOLs” or “Petitioners”), for an Order to obtain discovery for use in a foreign proceeding pursuant to 28 U.S.C. § 1782 (the “Application”), and upon all papers in support thereof; and the Court having jurisdiction over this matter; and upon proper and due consideration thereof; and the Court having found that the statutory requirements of 28 U.S.C. § 1782 are satisfied, and the discretionary factors, as described in *Intel Corp. V. Advanced Micro Devices, Inc.*, 542 U.S. 241, 264-266 (2004), weigh in favor of granting the Application.

IT IS HEREBY:

ORDERED that the Petitioners’ Application is granted; and it is further

ORDERED that the Petitioners are authorized to serve subpoenas in substantially the form set forth as **Exhibits C through T** of the Sybersma Declaration upon the following banks and banking associations: (1) Bank of America, N.A.; (2) The Bank of New York Mellon; (3) Citibank, N.A.; (4) Deutsche Bank AG, New York Branch; (5) Deutsche Bank Trust Company Americas; (6) Goldman Sachs and Co.; (7) HSBC Bank USA, N.A.; (8) J.P. Morgan Chase Bank, N.A.; (9)

Mashreqbank PSC, New York Branch; (10) Standard Chartered Bank US (a/k/a/ Standard Chartered Bank, New York Branch); (11) Wells Fargo Bank N.A.; (12) Barclays Bank PLC, New York Branch; (13) Société Generale North America; (14) BNP Paribas USA Inc.; (15) Bank of Nova Scotia; (16) UBS AG, New York Branch; (17) Commerzbank AG, New York Branch; and (18) The Clearing House Payments Company LLC (collectively, the “Correspondent Banks”); and it is further

ORDERED that the Correspondent Banks shall produce documents as specified in the subpoenas, and discovery shall be governed by the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Southern District of New York.

Dated: New York, New York
June __, 2020

SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE